

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

HEATHER DE MIAN,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:18-CV-01680-AGF
)	
CITY OF SAINT LOUIS, MISSOURI, et al.,)	
)	
Defendants.)	

JOINT PROPOSAL FOR AMENDMENT OF THE CASE MANAGEMENT ORDER

Pursuant to the Court’s June 3, 2021 Order (Doc. No. 79), the parties submit the following proposed amended case management order:

1. The discovery plan is as follows:
 - a. The parties do not anticipate any issues related to electronically stored information and agree that all electronically stored information shall be produced in a reasonably useable form. If it appears that electronically stored information will be extensive, the parties will work together to file a joint proposed ESI protocol with the Court. If the parties are unable to resolve any disagreements regarding electronically stored information, the parties will submit such disagreements to the Court for resolution.
 - b. The parties agree to submit a proposed order, as necessary, to assert claims of privilege or of protection as trial-preparation material after production, including agreements under Fed. R. Evid. 502. The parties further agree to submit a protective order designating that personal information regarding police officer defendants and witnesses, such as addresses and phone

numbers, will be disclosed for attorneys' and experts' eyes only and shall be subject to return or destruction at the conclusion of the case. The parties agree that documents containing such information can be used by the parties in filings with the Court, subject to redaction of any personal information. Further, where the public release of materials relating to law enforcement procedures and protocols would create a danger to the officers or public, the parties agree such documents will be disclosed for attorneys' and experts' eyes only and shall be subject to return or destruction at the conclusion of the case.

- c. The parties shall exchange Fed. R. Civ. P. Rule 26(a)(1) disclosures by **July 7, 2021**.
- d. Discovery will not be conducted in phases or limited to certain issues.
- e. Plaintiffs' supplemental expert witnesses and reports shall be disclosed no later than **September 17, 2021**; Plaintiffs' expert witnesses shall be made available for deposition no later than **October 18, 2021**. Defendants' experts and reports shall be disclosed no later than **November 22, 2021**; Defendants' expert witnesses shall be made available for deposition no later than **December 24, 2021**. Rebuttal experts and reports shall be provided no later than **January 24, 2022**, and rebuttal experts shall be made available for deposition no later than **February 24, 2022**.
- f. Except by written agreement of the parties or motion showing good cause, the presumptive limitations on the number of depositions and interrogatories apply to this case.

- g. Discovery will be completed by **March 3, 2022**.
 - h. All motions to compel discovery must be filed by **March 14, 2022**.
 - i. Any *Daubert* motions will be filed by **April 4, 2022**.
- 2. All dispositive motions shall be filed by **April 4, 2022**.
 - 3. The earliest possible date by which this case should reasonably be expected to be ready for trial is **September 12, 2022**.
 - 4. The estimated length of time expected to try the case to verdict is 4-5 days.

Dated: June 17, 2021

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Respectfully submitted,

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